

Q.NECTA/CPVT:FP.1-4: Please state whether FairPoint is committed to adhering to Verizon's current practice of maintaining in effect on a month-to month-basis interconnection agreements that have expired but under which Verizon and the CLEC have continued to operate. If so, please state whether this commitment will extend (a) through any transition period following the closing of the proposed transactions; and (b) on a month to month basis thereafter until the parties have negotiated a replacement agreement.

A.NECTA/CPVT:FP.1-4: FairPoint intends to adhere to Verizon's current practice of maintaining in effect on a month-to-month basis Interconnection Agreements that have expired but under which Verizon and the contracting carrier have continued to operate. Honoring such expired Interconnection Agreements on a month-to-month basis will extend through the transition period following the closing of the proposed transactions and thereafter until a replacement Interconnection Agreement has been negotiated or arbitrated. See A.DPS.FP.1-189.

Person Responsible for Response: Peter G. Nixon  
Title: Chief Operating Officer  
Date: April 19, 2007

Person Responsible for Response:  
Title:  
Date: April 19, 2007

Q.NECTA/CPVT:FP.1-5: Will Fairpoint commit to an extension of any CLEC interconnection agreement currently in a month-to-month status with Verizon for a period extending through December 31, 2010, the end of the current retail incentive rate plan that FairPoint has agreed to adopt (e.g. 3 years from the expected January 1, 2008 closing date)?

A.NECTA/CPVT:FP.1-5: See A.NECTA/CPV:FP.1-4. See A.DPS:FP.1-189.

Person Responsible for Response: Peter G. Nixon  
Title: Chief Operating Officer  
Date: April 19, 2007

Q.NECTA/CPVT:FP.1-70: Refer to page 8, Answer (8) of Mr. Leach's testimony which states that the proposed merger will create benefits for retail and wholesale customers.

- (a) What specifically are the infrastructure improvements that will benefit wholesale customers?
- (b) Do the same rates, terms and conditions for wholesale include both intrastate and interstate access rates?
- (c) For how long will Verizon's prices and commitments be maintained by FRP?
- (d) Describe improvements that will be made by FRP to OSS to enhance interaction with CLECs and other competitive providers.

A.NECTA/CPVT:FP.1-70:

- (a) FairPoint expects that the systems currently being developed will, in general, improve or update existing wholesale systems. Some possible improvements or updates include systems that are being built specifically, among other things, for the wholesale customers currently operating in the acquired Verizon areas, and containing processes designed to comply with requirements in each state. FairPoint is planning and designing the system architecture, interfaces and practices to support the Verizon operations in the three states and will be able to provide additional information once those steps are completed. See A.SOV/SEG:FP.1-35, 36.
- (b) FairPoint expects to maintain Verizon's current rates, terms, and conditions for intrastate and interstate access rates as long as is feasible. However, FairPoint cannot predict with any degree of certainty how access rates and structure will change as a result of regulatory changes at the state and/or federal level. FairPoint intends that the same rates, terms and conditions will apply to all tariffed-based rates and assumed interconnection contracts. See Prefiled Testimony of Peter G. Nixon at 26-30.
- (c) FairPoint is not prepared to indicate the period for which it will maintain the price commitments.
- (d) FairPoint is planning and designing the system architecture, interfaces and practices to support the Verizon operations in the three states and will be able to provide additional information once those steps are completed.

Person Responsible for Response: Peter G. Nixon  
Title: Chief Operating Officer  
Date: April 19, 2007

Q.NECTA/CPVT:FP.1-6: Please state whether FairPoint is committed to (a) providing transit service and transit rates under interconnection agreements entered into pursuant to Sections 251 and 252 of the federal Telecommunications Act; (b) agreeing not to seek to move transit service and transit rates out of an interconnection agreement and into a commercial agreement; and (c) agreeing not to raise the current Verizon rates for transit for a period extending through December 31, 2010, the end of the current retail incentive rate plan that FairPoint has agreed to adopt (e.g. 3 years from the expected January 1, 2008 closing date)?

A.NECTA/CPVT:FP.1-6: FairPoint is not prepared to respond to this request at this time. Notwithstanding the foregoing, FairPoint will assume the obligations of Verizon under interconnection agreements and wholesale tariffs (and the SGAT) in Vermont. See A.DPS:FP.1-189.

Person Responsible for Response: Peter G. Nixon  
Title: Chief Operating Officer  
Date: April 19, 2007

### **Trunk Ordering/Provisioning**

Q.NECTA/CPVT:FP.1-16: Please provide FairPoint's proposed procedures for placing trunk orders, timelines for the provisioning of trunk capacity to CLECs, and any proposed restrictions for trunk orders by CLECs in Vermont after the closing. Please identify if or how these proposed procedures will differ from Verizon's existing procedures. Will FairPoint provision trunks for CLECs in an interval comparable to FairPoint's own ability to augment capacity to service its own customers?

- a. What is the proposed standard interval?
- b. How many trunks can be ordered under standard intervals, is there a limit?
- c. If so, what is the number of trunk orders that triggers a non-standard interval and identify what that interval would be and why the interval is different?

A.NECTA/CPVT:FP.1-16: FairPoint is still in the process of developing its wholesale provisioning processes and thus the requested information is not yet available.

Person Responsible for Response: Chris Barron; Michael L. Harrington  
Title: Director, Corporate Director; Vice President, Network Engineering Services  
Date: April 19, 2007

**Port/Switch Capacity**

Q.NECTA/CPTV:FP.1-19: Please refer to Mr. Harrington's testimony at page 4. Has FairPoint determined the adequacy of existing central office equipment trunk port capacity to meet the capacity needs for traffic exchange with CLECs, based upon growth in demand for trunk port capacity? Please provide any documents prepared by or for FairPoint or made available to FairPoint regarding the existing and projected trunking needs of competitors (in the aggregate) in relation to existing trunk port capacity in Verizon central offices and include any estimate used for growth in aggregate competitor demand for trunk ports. If FairPoint has made no such determination and/or has not such documents, please state whether it is committed to providing this information to CLECs as part of the Preliminary Cutover Plan.

A.NECTA/CPVT:FP.1-19: FairPoint has not performed a detailed study of the adequacy of existing central office equipment trunk port capacity to meet the capacity needs for traffic exchange with CLECs, based upon growth in demand for trunk port capacity. FairPoint will share this information, as appropriate, as further analysis is performed.

Person Responsible for Response: Michael. L. Harrington  
Title: Vice President, Network Engineering Services  
Date: April 19, 2007

### **Mid Span Meet**

Q.NECTA/CPVT:FP.1-15: Will FairPoint provide mid-span meet (MSM) point arrangements with CLECs in VT, ME and NH, and include such commitments in its interconnection agreements with CLECs requesting MSMs? For MSMs, please provide the rates, ordering process, the provisioning interval and general terms and conditions that will be offered by FairPoint during the Transition Period and through December 31, 2010. If FairPoint has not developed this information at this time, please state when FairPoint is committed to providing this information to CLECs.

A.NECTA/CPVT:FP.1-15: OBJECTION: The question is overly broad and unduly burdensome in that it requests information and documents from operations outside of Vermont that are irrelevant and unlikely to lead to the discovery of admissible evidence and would require FairPoint to search for and to assemble, at substantial expense, a great deal of information. Without waiving any objection, FairPoint answers that FairPoint will honor the arrangements made by Verizon and after cutover agrees to meet with interested CLECs to discuss this request.

Person Responsible for Response: Peter G. Nixon  
Title: Chief Operating Officer  
Date: April 19, 2007

Q.NECTA/CPVT:FP.1-11: Refer to page 8 of the Nixon testimony discussing transition planning. Provide specific transition plans and post transition ordering processes and systems for CLEC interfaces with Fairpoint on the following items:

- a. number porting;
- b. trunk ordering;
- c. Directory assistance and directory listing updates;
- d. intercarrier compensation and billing
- e. 911 database updates;

To the extent that FairPoint has not developed any of the requested information, please state whether it is committed to providing this information to CLECs as part of the Preliminary Cutover Plan in order to afford CLECs an opportunity to provide input on potential changes in the above ordering processes and systems before such changes are designated for implementation in the Cutover Plan or during the Transition Period.

A.NECTA/CPVT:FP.1-11: FairPoint has not yet selected systems for CLECs to interface with FairPoint concerning number porting, trunk ordering, directory assistance and directory listing updates, intercarrier compensation and billing, and 911 database updates. FairPoint will provide CLECs information as early as possible, and already has declared its intention to work with CLECs in regard to planning, testing procedures and subsequent implementation. See Prefiled Testimony of Michael Haga at 15, Ins. 11-20; see A.NECTA/CPVT:FP.1-30.

Person Responsible for Response: Michael Haga  
Title: Director of Billing and Operations Support Systems  
Date: April 19, 2007



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of the )  
PUBLIC UTILITIES COMMISSION )  
Instituting a Proceeding Regarding ) Docket No. 2006-0400  
Hawaiian Telcom, Inc.'s Service Quality )  
and Performance Levels and Standards )  
in Relation To Its Retail and Wholesale )  
Customers. )  
\_\_\_\_\_ )

**HAWAIIAN TELCOM, INC.'S  
STATEMENT OF POSITION;  
EXHIBITS A – Q;  
and  
CERTIFICATE OF SERVICE**

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**DOCKET NO. 2006-0400  
HAWAIIAN TELCOM, INC.'S  
STATEMENT OF POSITION**

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provisioning systems and finally to the billing systems. The rate targeted for flow through was 90%.

**C. Hawaiian Telcom Engaged In Significant Contingency Planning To Prepare For Problems**

In addition to the testing that was being conducted, in preparation for the eventual cutover of its new systems, Hawaiian Telcom, in December 2005, created a "Contingency Team" to review the status of the development of the systems and to identify any gaps between what the applications were intended to do and what they were expected to be able to do on cutover. Departments across the Company participated in daily meetings lasting between 4-8 hours to identify the gaps in functionality and created workarounds. Most of the gaps identified were associated with the Company's complex business products (e.g. Multiline Hunt, Centrex, PRI, Frame Relay, and Asynchronous Transfer Mode ("ATM") rather than the high volume services such as R1, B1 and DSL.

Given the test results and statements by BE, the Contingency Team focused on developing plans and processes in preparation for the cutover. The most notable of the contingency team efforts was developing an alternative process for addressing the CRM and lack of flow through issues for the complex business products. That alternative process was a webform application and was designed with the assistance of Hawaiian Telcom employees and an outside consulting firm. The webform application is similar to CRM's order entry application. It was developed for the products and services that would not be available in CRM. After multiple reviews of testing output and meetings with BE, it was determined that at cutover, the only products that were going to be

available in CRM were high-volume products, single-line residential (R1), single-line business (B1) and DSL. Thus, the webform application was created to address the lack of functionality in the CRM order entry system for Hawaiian Telcom's higher-end business products. The webforms were part of a process that allowed for the same functions that would be performed by CRM and automated provisioning systems being developed by BE, to be performed separately. This web-based order entry system provided the call centers and provisioning teams with the ability to continue supporting Hawaiian Telcom's customers. The web-based system was easy to use for the business call centers and gave the provisioning teams the required information necessary for their function. While the webforms did not have the capability for flow through into the various provisioning systems being developed for cutover, the volumes anticipated to be processed through web forms were lower than R1, B1 and DSL and were expected to be manageable.

Because of the need to do some manual processing and handle anticipated increases in fallout, Hawaiian Telcom also established contracts with multiple vendors for additional staff in preparation for cutover. Over 100 resources were hired and trained with Tata Telecommunications Services, an outsourcing firm to support functions across the Company. In addition, approximately 30-45 call center resources were contracted from AFNI to supplement Hawaiian Telcom's consumer call center resources. AFNI had experience serving the Hawaii market as a call center contractor for Verizon. In

addition 15-20 local contractors were brought in to supplement staffing in multiple departments.

As part of planning for cutover, Hawaiian Telcom put in place three additional functions that supported both cutover and contingency readiness. First, a cutover "war room" was established as a central point to receive and resolve any issues related to the changes. This war room was staffed 24x7 with resources able to track issues and ensure they got to the right teams to resolve. Second, all departments across the Company developed temporary processes to continue business without systems. These processes doubled as contingency plans for unexpected issues that might arise during transition. For example, the order processing teams developed paper forms and a process for manually walking around orders from call centers to provisioning to dispatch to billing. Third, daily operations status calls were established. These calls included executive management as well as representatives from each operating department. The intent of the call was to review daily operations and resolve issues that arose related to the systems and network cutover.

Hawaiian Telcom utilized the same three additional functions for the wholesale markets segment that supported both cutover and contingency readiness. The war room and daily operations status calls involving executive management incorporated the wholesale markets segment to resolve issues. Contractors were hired and temporary processes were also established to assist in areas required such as in processing orders. Here, wholesale markets representatives used manual work-arounds for orders from customers to ensure

they were processed. Orders were hand-checked and individual calls were made to customers for verification of information instead of relying on an electronic method. In addition, daily collaborative meetings (further described in a later section) were held with wholesale customers which facilitated two-way communication of contingency plans and other activities.

**D. Based On The Information Before It, Hawaiian Telcom's Decision To Proceed With System Cutover Was Reasonable**

As the system development and testing progressed, so too did the formation of contingency plans and processes to address possible gaps in functionality that could occur. Having delayed the system cutover, BE and Hawaiian Telcom were carefully monitoring the continued development and testing of the systems, eventually on daily conference calls. As the rescheduled conversion date approached, testing was producing favorable results that indicated substantial functionality would be available at cutover. For example, on March 21, 2006, Hawaiian Telcom was provided information, based on testing, that the key CRM system would capture 80% of orders and that 80% or more of the orders would flow through to "convert to cash" without manual intervention (i.e., from order to provisioning to billing to collections to financial reporting). In addition, in the diagram below, the percent of passed test cases for Unit testing for each application are shown.



Q.NECTA/CPVT:FP.2-20: Please refer to FairPoint's response to NECTA/CPVT 1-34 and the Verizon response to Sovernet 1-39 at page 51 of 222. Provide an overview of Verizon's Vermont 911 activities in Vermont. Please state whether Verizon manages selective routers needed for 911 network operation/implementation and how and by whom these facilities will be provided during and after any Transition Period. Please explain Verizon's current level of responsibilities regarding 911 network operation/implementation in Vermont in comparison to Verizon's responsibilities in New Hampshire. Who will maintain and update the ALI data bases for Vermont?

A.NECTA/CPVT:FP.2-20: FairPoint's current understanding is that Verizon's 911 activities in Vermont are limited to providing E911 tandem services terminating on the selective routers operated by a third party under contract to the state. FairPoint will continue the same services after closing. FairPoint's current understanding of Verizon's E911 operations in New Hampshire is that Verizon is maintaining the ALI database through a month-to-month contract with the appropriate agency. FairPoint will assume whatever obligations Verizon has, at the time of closing, to update the ALI data bases in Vermont.

Person Responsible for Response: Michael Haga  
Title: Director of Billing and Operational Support Systems  
Date: May 10, 2007

**CLEC Handbook**

Q.NECTA/CPVT:FP.1-31: Please indicate whether FairPoint will adopt the current Verizon CLEC Handbook or whether it will provide a new or changed handbook that addresses specifications and timelines or intervals for various activities (e.g. trunk ordering, SS7, network routing, E911). In the event that FairPoint plans on a new or changed handbook or has not decided how it will proceed, please state whether FairPoint will commit to affording CLECs (a) a reasonable opportunity to review a draft CLEC Handbook and provide input to FairPoint; (b) training regarding any new interfaces; and (c) a six month period before implementation in order to conduct any internal training and system changes needed to adapt to the changes being implemented by FairPoint.

A.NECTA/CPVT:FP.1-31: FairPoint has made no decision yet about adopting the Verizon CLEC handbook or changing such. However, FairPoint will afford CLECs a reasonable opportunity to provide input into the ultimate process. FairPoint will also provide an escalation process to address CLEC-related issues. That process has not yet been developed. FairPoint will work with CLECs concerning planning, testing procedures and subsequent implementation. See also Prefiled Testimony of Michael Haga at 15, Ins. 17-20.

Person Responsible for Response: Michael Haga  
Title: Director of Billing and Operations Support Systems  
Date: April 19, 2007

Q.NECTA/CPVT:FP.1-80: Please state whether FairPoint is committed to adopting Verizon's current pole attachment tariff in Vermont, including rates, terms and conditions, for those areas now served by Verizon, at the time of closing and through (a) the term of the TSA or (b) December 31, 2010.

A.NECTA/CPVT:FP.1-80: FairPoint intends to adopt Verizon's tariffs in Vermont as of the closing of the transaction. FairPoint has not determined the time period under which it shall maintain the rates, terms, and conditions of Verizon's current pole attachment tariff. See A. NECTA/CPVT:FP.1-71.

Person Responsible for Response: Peter G. Nixon  
Title: Chief Operating Officer  
Date: April 19, 2007

Q.NECTA/CPVT:FP.2-40: Please refer to the responses to NECTA/CPVT 1-79 and 1-80. Will FairPoint commit to maintaining Verizon's pole attachment rates, terms and conditions through December 31, 2010, including but not limited to annual attachment rates and unit cost charges for make ready work?

A.NECTA/CPVT:FP.2-40: FairPoint will adopt Verizon's terms, conditions and pricing as of the day of the closing; however, we are not prepared to extend those rates through 2010.

Person Responsible for Response: Peter G. Nixon  
Title: Chief Operating Officer  
Date: May 10, 2007

Q.NECTA/CPVT:FP.1-81: Please state whether during any transition period FairPoint is committed to adopting Verizon's current internal administrative procedures for (a) handling conduit and pole licensing applications, including any related forms; (b) handling of make ready survey requests; (c) handling of make ready work; (d) charges for performance of make ready surveys and make ready work; (e) use of outside contractors; and (f) intervals for performing conduit and pole attachment make ready survey work and make ready work.

A.NECTA/CPVT:FP.1-81: FairPoint will adopt all of Verizon's then-current administrative procedures to the extent such procedures are covered under the Transition Services Agreement. To the extent such procedures are not covered by the TSA, FairPoint intends to replicate Verizon's procedures as much as possible.

Person Responsible for Response: Peter G. Nixon  
Title: Chief Operating Officer  
Date: April 19, 2007

Q.NECTA/CPVT:FP.1-82: Please identify any changes that FairPoint plans to make with regard to Verizon's current internal administrative procedures for (a) handling conduit and pole licensing applications, including any related forms; (b) handling of make ready survey requests; (c) handling of make ready work; (d) charges for performance of make ready surveys and make ready work; (e) use of outside contractors; and (f) intervals for performing conduit and pole attachment make ready survey work and make ready work during any transition period. Provide documentation of any proposed changes.

A.NECTA/CPVT:FP.1-82: FairPoint will adopt all of Verizon's then-current administrative procedures to the extent such procedures are covered under the Transition Services Agreement. To the extent such procedures are not covered by the TSA, FairPoint intends to replicate Verizon's procedures as much as possible. FairPoint has not yet completed process development in this area and is therefore not prepared to provide details. FairPoint will supplement this response as additional details become available.

Person Responsible for Response: Peter G. Nixon  
Title: Chief Operating Officer  
Date: April 19, 2007